

Exhibit A

Re: MEF Barbounis & McNulty

Seth Carson <seth@dereksmithlaw.com>

Thu 9/24/2020 8:15 AM

To: Walton, David <DWalton@cozen.com>

Cc: Benson, Leigh Ann <LBenson@cozen.com>; Cavalier, Jonathan <JCavalier@cozen.com>

I am here now and free all morning. Up to you guys?

Seth D. Carson, Esquire
Derek Smith Law Group, PLLC
1835 Market Street
Suite 2950
Philadelphia, PA 19103
Phone: 215.391.4790
Facsimile: 215.893.5288
Direct: 484.678.2210
Email: Seth@DerekSmithLaw.com

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From: Walton, David <DWalton@cozen.com>

Sent: Thursday, September 24, 2020 8:14 AM

To: Seth Carson <seth@dereksmithlaw.com>

Cc: Benson, Leigh Ann <LBenson@cozen.com>; Cavalier, Jonathan <JCavalier@cozen.com>

Subject: Re: MEF Barbounis & McNulty

Seth

I have a depo tomorrow starting at 12. I can talk before then.
Or you can talk with Jon or Leigh Ann.

Dave Walton
Sent from my iPhone

On Sep 24, 2020, at 12:06 AM, Seth Carson <seth@dereksmithlaw.com> wrote:

****EXTERNAL SENDER****

Dave,

Can we discuss this tomorrow too. I will get you what you need to finish written discovery. The issues in this case are flushed out. We need to do depositions and then dispositive motions and then see what happens. If the cases get past dispositive motions we can look toward trial sometime in the future.

I tried to schedule an appointment with Ms. Barbounis but she caught a bad fever and had to cancel. We are working on rescheduling so I can get finish up discovery.

We were supposed to meet this past Sunday and Monday.

I am available tomorrow all day to discuss.

Seth D. Carson, Esquire
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From: Walton, David <DWalton@cozen.com>
Sent: Tuesday, September 22, 2020 10:53 AM
To: Seth Carson <seth@dereksmithlaw.com>
Cc: Benson, Leigh Ann <LBenson@cozen.com>; Cavalier, Jonathan <JCavalier@cozen.com>; Sidney Gold <sgold@discrimlaw.net>; Bill Rieser <brieser@discrimlaw.net>
Subject: MEF Barbounis & McNulty

Seth

Despite our numerous requests, you have failed to produce written responses to our documents requests in both the Barbounis and McNulty cases. These responses are inexplicably several months late. Please send us these responses by COB tomorrow or we will file a motion to compel in both cases.

Dave



David J. Walton
Shareholder
Cozen O'Connor

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